

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

v.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

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) Civil Action No. 04-10353 PBS
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PLAINTIFF'S MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff ScanSoft, Inc. ("ScanSoft") moves this Court to enter a protective order in this case. As grounds for this motion, ScanSoft states that both parties are competitors in the field of speech recognition technology, and possess highly confidential and proprietary information that will likely be sought in discovery (including without limitation, source code, technical documents and financial documents). A protective order is needed to govern the handling and protection of this information.

Accordingly, ScanSoft respectfully requests that the Court grant this motion and enter the proposed protective order, attached to hereto as Exhibit A.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that I forwarded a proposed stipulation and protective order to counsel for defendants on June 2, 2004 and since that time have attempted to confer with counsel for defendants. Counsel for defendants, however, has been unable to confer regarding the proposed

order. ScanSoft wishes to have a Protective Order entered as soon as possible so that discovery of confidential documents and information in this case will not be delayed.

Dated: June 18, 2004

SCANSOFT, INC.,
By its attorneys,

s/ Julia Huston

Lee Carl Bromberg, BBO #058480
Robert Asher, BBO #022865
Julia Huston, BBO #562160
Lisa M. Fleming, BBO #546148
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above document was served upon counsel for the defendants, Paul Popeo, Esq., Choate, Hall & Stewart, Exchange Place, 53 State Street, Boston, Massachusetts 02109, by hand on the above date.

s/ Julia Huston

Julia Huston

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